

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF PUERTO RICO

IN RE:
EDWARD MELENDEZ LOZADA
DEBTOR

CASE NUM.: 13-09869 ESL
CHAPTER 13

IN RE:
RAMON E. C ALIZ APONTE
DEBTOR

CASE NUM.: 13-09877
CHAPTER 13

MOTION REQUESTING WITHDRAWAL AS LEGAL COUNSEL

TO THE HONORABLE COURT:

COME(S) the undersigned counsel and respectfully Allege(s)
and Prays as follows:

1. The undersigned attorney represents debtor(s) in the instant case.
2. Due to personal circumstances the undersigned has to take a leave of absence from her office without a date of return. Therefore, the undersigned has to resign as legal representative in the above captioned case.
3. That in compliance with Code #20 of the Code of Professional Ethics, 4 IPRA, Appendix 4-A, the undersigned informs that debtor's last known address is: , and request that all notices be forward to that address.
4. As required by the applicable ethical rules, the aforementioned party has been informed of the status of the

case. The undersigned met with debtor(s), discussed captioned case proceedings status and notified the need to resign current legal representation. In addition, reasonable steps have been taken to protect its interest as require by Rule 1.16(d) of the Model Rules of Professional Conduct.

5. The undersigned has given or made available to debtor(s) the Bankruptcy file at the office, as per his last known address and message in his last know cellular number.

6. A thirty (30) days period is requested from this Honorable Court for Debtor(s) to announce new legal representation. It is also requested that due to the fact that there would be no legal representation for debtor(s) during same period no dispositive motion be considered until a new legal counselor assumes representation.

7. In view of the above, the undersigned herein resigns and withdraws as legal counselor for debtor(s) in the instant case.

WHEREFORE it is respectfully requested from this Honorable Court to GRANT this Motion and Allow the undersigned to withdraw as legal counsel in the instant case and allow debtor(s) thirty (30) days to acquire new legal representation and address any pending matter, it is also requested that until new legal representation is announced for this Honorable Court not to enter into the merits of any dispositive motion unless debtors have announce new legal representation and had the opportunity

to address any other pending matters that may arise during said period, with any other remedy this Honorable Court may deem appropriate.

NOTICE

Within five (5) days after service as evidenced by the certification, and an additional three (3) days pursuant to Fed. R. Bank. P. 9006(f) if you were served by mail, any party against whom this paper has been served, or any other party to the action who objects to the relief sought herein, shall serve and file an objection or other appropriate response to this paper with the Clerk's office of the U.S. Bankruptcy Court for the District of Puerto Rico. If no objection or other response is filed within the time allowed herein, the objection will be deemed unopposed and may be granted unless: (1) the requested relief is forbidden by law; (2) the requested relief is against public policy; or (3) in the opinion of the court, the interest of justice requires otherwise. If you file a timely response, the court may - in its discretion - schedule a hearing.

In San Juan, Puerto Rico, this March 6, 2014.

RESPECTFULLY SUBMITTED.
/s/ Marilyn Valdes Ortega
MARILYN VALDES ORTEGA
USDC PR 214711
P.O. Box 195596
San Juan, PR 00919-5596
Tel. (787) 758-4400
Fax. (787) 763-0144
E-mail valdeslaw@prtc.net

In re:
RAMON E CALIZ APONTE
Debtor

Case No. 13-09877-ESL
Chapter 13

CERTIFICATE OF NOTICE

District/off: 0104 3

User: mendezv
Form ID: oacs

Page 1 of 1
Total Noticed: 19

Date Rcvd: Dec 20, 2013

Notice by first class mail was sent to the following persons/entities by the Bankruptcy Noticing Center on Dec 20, 2013.

3831257 AEE, PUERTO RICO ELECTRIC AUTHORITY, PO BOX 71524, SAN JUAN, PR 00936-5624
3831258 +ALLIED INTERSTATE LIV, PO BOX 361774, COLUMBUS, OH 43236-1774
3831260 BANK OF AMERICA, PO BOX 15019, WILMINGTON, DE 19850-5019
3831261 ++CASTLEROCK SECURITY INC, 400 WEST DIVISION STREET, SYRACUSE NY 13204-1438
(address filed with court: Castlerock Security, 950 Spencer Street, Suite 200, Syracuse, NY 13204)
3831262 +COLLECTION ADVISEMENT ASSOCIATES, INC., PO BOX 195013, SAN JUAN, PR 00919-5013
3831263 +DEPARTAMENTO DEL TRABAJO, AVE MUÑOZ RIVERA 505, HATO REY, PR 00918-3352
3831264 FEDERAL LITIGATION DEPT OF JUSTICE, PO BOX 9020192, SAN JUAN, PR 00902-0192
3831265 +FIA CARD SERVICES, PO BOX 15019, WILMINGTON, DE 19850-5019
3832878 PR ACQUISITIONS LLC, PO BOX 194499, SAN JUAN PR 00919-4499
3831272 +PRA RECEIVABLES MANAGEMENT LLC, PORTFOLIO RECOVERY ASSOCIATES LLC, PO BOX 12914, NORFOLK, VA 23541-0914
3831273 IRG PREMIER BANK OF PR, D/B/A SCOTTABANK OF PR, PO BOX 362394, SAN JUAN, PR 00936-2394
3831274 SCOTTABANK, PO BOX 362230, SAN JUAN, PR 00936-2230
3831275 TREASURY DEPARTMENT, PO BOX 9024140, OFICINA 424-B, SAN JUAN, PR 00902-4140

Notice by electronic transmission was sent to the following persons/entities by the Bankruptcy Noticing Center.

3831259 E-mail/Text: iudaygarcia@bpapr.com Dec 20 2013 19:22:02 BANCO POPULAR DE PR, PO BOX 366818, SAN JUAN, PR 00936-6818
3831266 E-mail/PDF: geusedi@recoverycorp.com Dec 20 2013 19:31:10 GE CAPITAL RETAIL BANK, PO BOX 965004, ORLANDO, FL 32896-5004
3831268 E-mail/Text: cfo.bncremail@irs.gov Dec 20 2013 19:18:55 INTERNAL REVENUE SERVICE, PO BOX 7346, PHILADELPHIA, PA 19101-7346
3831267 E-mail/Text: cfo.bncremail@irs.gov Dec 20 2013 19:18:55 INTERNAL REVENUE SERVICE, MERCANTIL PLAZA BLDG, ROOM 1014, 2 PONCE DE LEON AVE. STOP 27 1/2, SAN JUAN, PR 00918-1693
3831269 E-mail/PDF: geusedi@recoverycorp.com Dec 20 2013 19:28:32 JC PENNEY, PO BOX 960090, ORLANDO, FL 32896-0090
3831271 E-mail/Text: bankruptcydepartment@ncoigroup.com Dec 20 2013 19:21:54 NCO FINANCIAL SYSTEMS, PO BOX 17030, WILMINGTON, DE 19850-7080

TOTAL: 6

***** BYPASSED RECIPIENTS (undeliverable, * duplicate) *****
3831270 #+National Credit Scuti, Po Box 15779, Oklahoma City, OK 73155-5779

TOTALS: 0, * 0, # 1

Addresses marked '+' were corrected by inserting the ZIP or replacing an incorrect ZIP.
USPS regulations require that automation-compatible mail display the correct ZIP.

Addresses marked '##' were redirected to the recipient's preferred mailing address pursuant to 11 U.S.C. 342(f)/Fed.R.Bank.PR.2002(g)(4).

Addresses marked '##' were identified by the USPS National Change of Address system as undeliverable. Notices will no longer be delivered by the USPS to these addressees; therefore, they have been bypassed. The debtor's attorney or pro se debtor was advised that the specified notice was undeliverable.

I, Joseph Speetjens, declare under the penalty of perjury that I have sent the attached document to the above listed entities in the manner shown, and prepared the Certificate of Notice and that it is true and correct to the best of my information and belief.

Meeting of Creditor Notices only (Official Form 9): Pursuant to Fed. R. Bank. P. 2002(a)(1), a notice containing the complete Social Security Number (SSN) of the debtor(s) was furnished to all parties listed. This official court copy contains the redacted SSN as required by the bankruptcy rules and the Judiciary's privacy policies.

Date: Dec 22, 2013

Signature: /s/Joseph Speetjens

CM/ECF NOTICE OF ELECTRONIC FILING

The following persons/entities were sent notice through the court's CM/ECF electronic mail (Email) system on December 20, 2013 at the address(es) listed below:
ALEJANDRO OLIVERAS RIVERA aoreci@ch13sju.com
MARILYN VALDES ORTEGA on behalf of Debtor RAMON E CALIZ APONTE valdeslaw1@gmail.com
MONSITA LECAROZ ARRIBAS ustpregion21.ecf@usdoj.gov

TOTAL: 3

In re:
EDWARD MELENDEZ LOZADA
Debtor

Case No. 13-09869-ESL
Chapter 13

CERTIFICATE OF NOTICE

District/cff: 0104 3

User: mendeza
Form ID: pdf001

Page 1 of 1
Total Noticed: 12

Date Rcvd: Dec 04, 2013

Notice by first class mail was sent to the following persons/entities by the Bankruptcy Noticing Center on Dec 06, 2013.

db +EDWARD MELENDEZ LOZADA, 87 CALLE ACOSTA ESQ GEORGETTI, CAGUAS, PR 00725-3731
smg DEPARTAMENTO DE HABITENDA, PO BOX 9024140, OFICINA 424-B, SAN JUAN, PR 00902-4140
smg PR DEPARTMENT OF LABOR, PRUDENCIPIO RIVERA MARTINEZ BLDG, 505 MUÑOZ RIVERA AVENUE, 12 FLOOR,
SAN JUAN, PR 00918
3831062 AMERICAN EXPRESS, PO BOX 1270, NEWARK, NJ 07101-1270
3831064 CAGUAS COOP, PO BOX 1252, CAGUAS, PR 00726-1252
3831065 POLARIS, PO BOX 70366, SAN JUAN, PR 00936-8366
3831066 DEPARTAMENTO DEL TRABAJO, AVE MUÑOZ RIVERA 505, HATO REY, PR 00918-3352
3831067 FEDERAL LITIGATION DEPT OF JUSTICE, PO BOX 9020192, SAN JUAN, PR 00902-0192
3831068 TOYOTA CREDIT DE PUERTO RICO, PO BOX 366251, SAN JUAN, PR 00936-6251
3831069 TREASURY DEPARTMENT, PO BOX 9024140, OFICINA 424-B, SAN JUAN, PR 00902-4140

Notice by electronic transmission was sent to the following persons/entities by the Bankruptcy Noticing Center.

smg E-mail/Text: ustpregion21.hr.ecf@usdoj.gov Dec 04 2013 19:12:31 US TRUSTEE, EDIFICIO OCHOA,
500 TANCA STREET SUITE 301, SAN JUAN, PR 00901-1922
3831063 E-mail/Text: g20956@att.com Dec 04 2013 19:13:42 AT&T, PO BOX 15067,
SAN JUAN, PR 00902-8567

TOTAL: 2

***** BYPASSED RECIPIENTS (undeliverable, * duplicate) *****
smg+ FEDERAL LITIGATION DEPT. OF JUSTICE, PO BOX 9020192, SAN JUAN, PR 00902-0192
TOTALS: 0, * 1, # 0

Addresses marked '+' were corrected by inserting the ZIP or replacing an incorrect ZIP.
USPS regulations require that automation-compatible mail display the correct ZIP.

I, Joseph Speetjens, declare under the penalty of perjury that I have sent the attached document to the above listed entities in the manner shown, and prepared the Certificate of Notice and that it is true and correct to the best of my information and belief.

Meeting of Creditor Notices only (Official Form 9): Pursuant to Fed. R. Bank. P. 2002(a)(1), a notice containing the complete Social Security Number (SSN) of the debtor(s) was furnished to all parties listed. This official court copy contains the redacted SSN as required by the bankruptcy rules and the Judiciary's privacy policies.

Date: Dec 06, 2013

Signature: /s/Joseph Speetjens

CM/ECF NOTICE OF ELECTRONIC FILING

The following persons/entities were sent notice through the court's CM/ECF electronic mail (Email) system on November 27, 2013 at the address(es) listed below:

MAPILYN VALDES OPTEGA on behalf of Debtor EDWARD MELENDEZ LOZADA valdeslaw1@gmail.com
MONSITA LECAROZ APRIBAS ustpregion21.hr.ecf@usdoj.gov

TOTAL: 2